

14 July 1980

MEMORANDUM FOR: Special Assistant to the DCI
for Compartmentation

FROM: [redacted]
Deputy Director for Community Affairs

SUBJECT: Comments on [redacted]
Study

1. I have reviewed your comments on [redacted] study and must agree with you that from its scope one could not realistically grasp the SCI access utilization. Nonetheless I believe that the study did establish a positive indication that there are more access approvals abroad than are being used.

2. [redacted] study confirms this. [redacted] approach was one of a questionnaire to over [redacted] SCI access holders in the CIA headquarters elements. The questionnaire sought response as to why access was held. Over [redacted] responses were received and reviewed to ascertain whether a valid need exists for these accesses.

3. The questionnaire lists 16 generally recognized reasons for SCI access. This wide range of reasons far exceeds the usual interpretation of need-to-know based on contribution to the compartmented effort or on a requirement for substantive access in conjunction with duties. There were [redacted] people who used these 16 general reasons. There were [redacted] others who gave 39 additional reasons. In reviewing these reasons, it was apparent to [redacted] that more than a few of the rationales were spurious.

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25X1A 4. The great number of legitimate reasons for access to current SI and TK compartments make it apparent that those access approvals in some manner have become involved with the day to day activities of the Agency across the board for almost all personnel. If personnel do not have need-to-know, they have need-for-access to secure areas, or they hold clearances because they are near a secure phone; or, as [] points out in his part of the study, because they are on standby should it be necessary to get substantively involved.

5. As a result, the limiting aspects of the current SCI systems have faded and are now more form than substance.

25X1A 6. Since a hoped for goal of this study was to determine whether or not CIA could reasonably proceed with a one for one exchange of accesses into the [] system, a critical review was made of the responses. [] makes certain recommendations in consequence of that review. These recommendations are in some cases quite specific and relate to desirable actions proposed for implementation under current systems. They are being addressed. In other cases the recommendations relate to actions proposed in converting current access approvals to equivalent [] compartments. These suggestions will be made available to appropriate officers at the time of [] conversion. 25X1A 25X1A

25X1A 7. There is a third category of reasons for access which [] points out but makes no associated recommendation. This represents that group of [] individuals cleared for access because a gray or green telephone is located in their work area. The lack of meaningful comment here may be due to a perception that [] policy does not address such prescription. It is relevant only in that the same questioning perception could arise in other areas and departments as [] conversions begin. Clarification of this issue should be forthcoming from the [] Steering Group. 25X1A 25X1A 25X1A

25X1A 8. On balance, both [] phases of the study indicate that there are more clearances in the Agency than access needs warrant under current systems. It seems reasonable to project that the same condition would pertain following a one-for-one conversion to [] if there is no serious review of need and if there is no policy ruling on the acceptability of the multiplicity of justifications now extant and rather routinely accepted for access approval. 25X1A 25X1A

9. I would propose that the list of reasons given by CIA respondents be reviewed by you and the Control Staff for a general consensus of their acceptability and then be submitted to the Steering Group.

10. Two things may result:

First - a clearer focus of why access approvals are given now and a critical evaluation of their sufficiency and relation to both the policy intent and procedural implementation of the forthcoming [] system.

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Second - an opportunity to structure a guidance list, defining need-to-know by examples of acceptable justifications.



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